

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION (LYNCHBURG)

IN RE:)	CHAPTER 11
)	CASE NO. 22-60115
A.G. DILLARD, INC.,)	
)	
Debtor(s).)	
-----)	
)	
Falcon Leasing, a Division of Falcon National Bank,)	
)	
Movant,)	
)	
v.)	Motion No. _____
)	
A.G. DILLARD, INC.,)	
and)	
U.S. TRUSTEE'S OFFICE, Trustee,)	
)	
Respondents.)	

**MOVANT'S CERTIFICATION REQUIRED WITH
RESPECT TO MOTION FOR RELIEF FROM STAY**

TO THE HONORABLE REBECCA B. CONNELLY:

1. Description of Property: 2019 Caterpillar 336 Excavator, Serial No. DKS01790
2. Copies of Security Instruments: Filed with Movant's Motion for Relief from Stay as Exhibit 1.
3. Statement of Amount Due:

a. Unpaid Principal (Current Balance):	\$238,415.29
b. Accrued Interest from _____ to _____:	\$ <u>N/A</u>
c. Late Charges from _____ to _____:	\$ <u>N/A</u>
d. Attorney's Fees:	\$ <u>TBD</u>
e. Advances for Taxes, Insurance, etc.:	\$ <u>N/A</u>
f. Unearned Interest:	\$ <u>N/A</u>
g. Other Charges:	\$ _____
4. Per Diem/Annual Interest: % N/A

5. Detailed Report of Appraiser: \$163,000 (Debtor's Schedules); \$195,070 (Machinery Trader Valuations, filed herewith).

Basis of such valuation: Movant respectfully moves pursuant to the provisions of Va. Code Ann. § 8.01-419.1 and Rule 201 of the Federal Rules of Evidence that the Court take notice of the Debtor's scheduled valuation of \$163,000.00, and the average value of \$195,070 set forth on the Machinery Trader website, and industry standard for the valuation of such equipment.

The undersigned does hereby certify, as a Member of the Bar of this Court, that I represent the above-named Movant(s) and that the information contained herein is true according to the best of my knowledge and belief.

DATE: APRIL 24, 2022

By /s/ Steven L. Higgs
Of Counsel

STEVEN L. HIGGS, P.C. (VSB # 90566)
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Counsel for Falcon Leasing, a Division of Falcon National Bank

CERTIFICATE OF MAILING

The undersigned does hereby certify that a true and correct copy of the foregoing was mailed by first class mail, postage prepaid, or served electronically on April 24, 2022, to:

Robert S. Westermann, Esq.
Hirschler Fleischer, P.C.
P.O. Box 500
Richmond, Virginia 23218-0500
Counsel for A.G. Dillard, Inc.

A.G. Dillard, Inc. (with enclosures\N)
295 Memory Lane
Troy, Virginia 22974

U.S. Trustee's Office, Trustee
210 First Street, S.W., Suite 505
Roanoke, Virginia 24011

/s/ Steven L. Higgs

Our File No. 22100.001\\FILES\22100.001\MRS - Vehicle - Movants Certification\04/24/22